

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA,

CRIMINAL No: 21cr122

VS.

GEORGE VLASTOS,

Electronically Filed

Defendant.

MOTION TO CONTINUE SENTENCING HEARING

AND NOW, comes the Defendant, George Vlastos, by and through his attorney, PATRICK K. NIGHTINGALE, ESQUIRE, who brings the Motion and in support thereof sets forth the following:

1. Defendant's Sentencing Hearing is scheduled October 21, 2022.
2. The defense has recently engaged the services of a Mitigation Specialist to assist with sentencing in this matter. Additional time is needed to address Defendant's significant and serious medical conditions, including Defendant's severe epilepsy and his medication regimen.
3. Defendant's primary treating neurologist has relocated and the defense requires additional time to contact and interview him.
4. Defendant, therefore, requests one final continuance of ninety (90) days for sentencing in this matter.
5. Similarly, Defendant requests that the deadline for his Sentencing Memorandum be extended accordingly.

6. Christopher Cook, Esquire, consents to the relief requested.

WHEREFORE, Defendant George Vlastos respectfully requests this Honorable Court grant the within Motion to Continue.

Respectfully Submitted,

/s/ Patrick K. Nightingale, Esquire
Attorney I.D. # 76015
Attorney for Defendant